UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION

٦	_	
ı	n	ro
1	ш	IU.

PHIL DONAHUE, RUTH A DONAHUE CASE NO.: 6:17-BK-07410-CCJ

Debtor./

<u>DEBTORS' MOTION FOR REFERRAL TO</u> MORTGAGE MODIFICATION MEDIATION

The Debtors', Phil Donahue and Ruth A. Donahue request entry of an order referring the Debtors' and Partners Federal Credit Union., whose mortgage lien encumbers the Debtors' real property know as a 2005 Merits of Home Twin Manor/DLX,

VIN: FLHMBT72051792A with a Loan Number ending in 6280, to mortgage modification mediation, and in support states:

- 1. The Debtors' filed this bankruptcy case in an attempt to retain their primary residence.
- 2. The Debtors' would like to modify the terms of the mortgage encumbering their primary residence. The Debtor's income will allow them to contribute as much as 31% of their current gross income to payment of their modified mortgage debt.
- 3. Mediation will assist the parties in negotiation of a modification of the relevant mortgage.

WHEREFORE, the Debtors' requests the entry of an order referring this case to mediation and for such other and further relief as the Court deems just and proper.

Respectfully submitted this 4th day of December, 2017.

/s/ ADAM G. RUSSO

Adam G. Russo, Esq. Florida Bar No. 84633 Myers, Eichelberger & Russo, P.L. 5728 Major Blvd., Suite 735 Orlando, FL 32819

Telephone: 407-926-2455 Facsimile: 407-536-4977

Email: Adam@theMElawfirm.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided by U.S. Mail, electronic mail, or facsimile transmission on this 4th day of December, 2017 to Arvind Mahendru, Chapter 7 Trustee, 5703 Red Bug Lake Road, Suite 284., Winter Springs, Florida 32708; Partners Federal Credit Union C/o Rush, Marshall, Jones and Helly Pa Attention: Andrew W. Houchins., PO Box 3146., Orlando Florida 32802; Partners Federal Credit Union., 2190 S Town Centre Place., Anaheim, CA 92806.

/s/ ADAM G. RUSSO

Adam G. Russo, Esq. Florida Bar No. 84633 Myers, Eichelberger & Russo, P.L. 5728 Major Blvd., Suite 735 Orlando, FL 32819

Telephone: 407-926-2455 Facsimile: 407-536-4977

Email: Adam@theMElawfirm.com